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Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20445

REF: MM Docket No. 99-325

Dear Mr. Caton:

Harris Corporation submits these comments in response to the Commission's December 19, 2001 Public Notice seeking views on a report submitted by National Radio Systems Committee. This report reveals the extensive testing by the Committee of the iBiquity in-band-on-channel digital audio broadcasting system, (IBOC DAB system.) Harris believes the Commission should endorse IBOC for the transition to terrestrial digital radio in the United States.

Harris Corporation is the world's leading manufacturer of radio and television broadcast transmission equipment, automation solutions and studio systems. Harris is widely recognized as the industry leader in providing broadcasters with a smooth, comprehensive and cost-effective migration path from analog to digital broadcasting.

Competitive market forces based on technological changes and growing consumer demand for improved and enhanced audio quality, along with datacasting, necessitate a response from today's analog radio broadcasters. If tomorrow's terrestrial broadcaster is to occupy the dominant and important role it plays today in the lives of Americans, then changes must begin to occur immediately in the technology, equipment and regulatory structure of this industry.

Consumers have been introduced to services and equipment that provide higher standards of audio quality. Digital recordings and play-back devices now deliver superior, refined sound. Delivery of digital music is available by cable, the internet, direct broadcast satellite and by satellite digital radio services. Expectations by consumers of superior sound heighten the need to improve the standard of delivery for radio broadcasters. The IBOC DAB system provides the means by which terrestrial broadcasters can gain parity with other delivery methods and preserve the unique and important roles they occupy.



IBOC DAB is a necessary and available tool for broadcasters to participate in the digital revolution. The technology is proven, both in the lab and through on-air tests. Harris has taken the initiative to obtain a license from iBiquity to produce IBOC exciters and transmitters. At the National Association of Broadcasters show in April, 2002, Harris will be showing its new IBOC product offerings for AM and FM broadcasters, and will be capable of delivering IBOC-products shortly thereafter. IBOC technology will allow terrestrial radio broadcasters to improve sound quality significantly; to offer auxiliary services localized for a unique audience appeal that cannot be matched by other delivery modes; and, provide the AM broadcaster with the option to restore music programming as a viable, important part of on-the-air offerings.

Other improvements also flow from the IBOC DAB system including dramatically improved immunity from common FM multipath reception problems, improved full stereo coverage, and data casting options. IBOC DAB permits broadcasters to enhance service without disruptions to existing analog radio service and without the need for new frequency allocations and the issuances of new licenses.

Harris has been an active participant in the development of the IBOC DAB technology since its inception by providing real world broadcast equipment for on air IBOC testing. Because of Harris' experience in the digital television transition, Harris encouraged competing IBOC interests to combine to achieve a "best of the best" solution. A unified approach to the migration to digital radio broadcasting is the least disruptive, most advantageous path to a successful transition.

In conclusion, Harris recommends that the FCC adopt IBOC DAB for AM and FM radio stations, as an official standard, as quickly as possible. This will allow radio broadcasters a better opportunity to compete with new forms of digital competition. Radio broadcasting must remain strong to afford the investment necessary to implement IBOC DAB, while at the same time continuing to provide the free, widely varied and locally oriented programming so much a part of America's over-the-air audio options.

Respectfully Submitted,

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Harris Corporation